

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

In Re: Kathleen Rossanne Allbee) Case No. 23-30075
)
Debtor)

MOTION TO APPROVE APPLICATION FOR ATTORNEY FEES

COMES NOW Debtor, by and through the counsel of record, and moves the Court to Approve Attorney's Fees state as follows:

1. That this attorney is the duly appointed attorney of the above named debtor in the Chapter 13 proceeding.
2. That this attorney has not previously made an application for fees in this Chapter 13 case. The proposed attorney fee is in excess of \$4,100 and pursuant to Local rule 2016 (C) this attorney files this application for fees. Such proposal is for direct payment of \$2,000 from debtor to counsel, and for payment of \$3,500 via the plan.
3. That attorney of record has spent an inordinate amount of time in meeting with the Debtor and preparing this case for filing with the Court; that debtor's attorney has spent approximately 5.7 hours in person with client including three in office visits for intake of information for Debtor, reviewing documentation, consultation, preparation, discussing pending foreclosure and agreeing to filing to stop same. Complications that required more time in this case include reviewing documentation and information from a previously filed Chapter 13 bankruptcy case and preparing a Motion to Extend the Automatic Stay with affidavit and Motion to Expedite as well as a Motion to Transfer. Additionally, another 4.6 hours of time was spent for in office work on the file including: review of assets and values for Debtor, structuring a Ch.13 Plan, reviewing tax returns, filing the complete petition, reviewing creditor information, bank accounts, calculating means test for Debtor, the initial plan preparation, preparation of schedules, reviewing schedules and

procedures with the Debtor. In addition, there will be additional hours of work post filing to get plan confirmed. Attorney will prepare and attend the 341 hearing and, review claims as they are filed. In light of the number of hours that this Debtor's attorney has and will expend on this case, this attorney believes that the fee of \$5,500 is the appropriate fee; that debtor has paid \$2,000 prior to filing of the bankruptcy and has proposed to pay the remaining \$3,500 through the Chapter 13 plan and this Debtor's attorney suggests that the fees are appropriate and ask that the Court approve the same.

WHEREFORE, Attorney prays that the Court approve the attorney fee designated in the above case of \$5,500 for representing the debtor in this Chapter 13 case.

Dated: 03/30/2023

Respectfully submitted,
LICATA BANKRUPTCY FIRM, P.C.

/s/Jesse L. Langford

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ATTORNEY FOR DEBTOR

NOTICE OF MOTION

Within 21 days from the date of service of this notice, creditors may file objections as to why the Application should not be granted with the **U.S. Bankruptcy Court, Room 1510, U.S. Courthouse, 400 East 9th Street, Kansas City, Missouri 64106, and serve a copy on debtor's counsel.** If objections are timely filed, the Court will rule the matter from the pleadings or set the objections for a hearing, if appropriate. If no objections are filed, the Court will enter its order without further notice.

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2023, the foregoing was delivered via e-mail to the parties of interest that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to all creditors and parties of interest not registered to receive electronic filings on ECF.

/s/Jesse L. Langford

ATTORNEY FOR DEBTOR